Title V Federal Operating Permit
Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	MW Manufacturers, Inc.
Facility Name:	MW Manufacturers, Inc.
Facility Location:	433 North Main Street Rocky Mount, Virginia
Registration Number:	30386
Permit Number:	WCRO-30386

October 11, 2007	**October 10, 2012**
Renewal Effective Date	Expiration Date

Steven A. Dietrich, P.E. Signature Date
Regional Director

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I. Facility Information

Permittee
MW Manufacturers, Inc.
433 North Main Street
Rocky Mount, VA 24151

Responsible Official
Mark S. Swaffar, V.P. Operations

Facility
MW Manufacturers, Inc.
433 North Main Street
Rocky Mount, VA 24151

Contact Person
Lynn Akers, Safety Coordinator
540/483-0211

County-Plant Identification Number: 51-067-0023

Facility Description: NAICS code 321911 (formerly SIC 2431) – Establishments primarily engaged in manufacturing fabricated wood millwork, including wood millwork covered with materials such as metal and plastics.

This plant primarily manufactures vinyl, wood and vinyl clad windows and doors. The plant has been in existence at its current location since the 1940's and the plant received its first air permit on June 27, 1974. The facility is a Title V major source of VOC and Sulfur Dioxide. This source is located in an attainment area for all pollutants, and is a PSD major source due to permitted VOC emission limits totaling 459.3 tons per year. The facility is presently permitted under a minor NSR permit issued on July 23, 2007 (superseding the NSR permit dated September 26, 2005).

Compliance Status: The facility is inspected regularly. The facility was last inspected and found to be in compliance on August 3, 2006.

II. Emission Units

Equipment to be operated consists of:

Unit Ref. No.	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment					
1	CNB Tri-Fuel Boiler	21.32 MMBtu/hr (coal) 17 MMBtu/hr (wood)	Custom Multicyclone	PM	NSR 07/23/2007
Wood Processes					
2	Dual Vapor Pressure (DVP) Solvent-Based Wood Preservation Process	141,396 gal/yr	none	--	NSR 07/23/2007
3	Water-Based Wood Preservation Process - dipping and drying	100,000 gal/yr	none	--	NSR 07/23/2007
4	Wood Parts Priming - 1 Rollcoat primer unit - 3 Spraycoat primer units	--	none	--	NSR 07/23/2007
5	wood milling/machining	20,000,000 bdft/yr	2 Pneumafil Baghouses	PM	NSR 07/23/2007

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

III. CNB Tri-Fuel Boiler Requirements – Emission Unit #1

A. Limitations

1. Particulate emissions from the CNB Tri-Fuel boiler shall be controlled by a multicyclone. The multicyclone shall be provided with adequate access for inspection.
(9 VAC 5-80-110 and Condition 5 of 07/23/2007 NSR Permit)

2. The approved fuels for the CNB Tri-Fuel boiler are coal and wood. A change in the fuels may require a permit to modify and operate.
(9 VAC 5-80-110 and Condition 14 of 07/23/2007 NSR Permit)

3. The sulfur content of the coal to be burned in the CNB Tri-Fuel boiler shall not exceed 1 percent by weight per shipment. The permittee shall maintain records (supplier fuel analysis) of all coal shipments purchased. These records shall be available for inspection by the DEQ. Such records shall be kept current for the most recent five years.
(9 VAC 5-80-110 and Condition 15 of 07/23/2007 NSR Permit)

4. Emissions from the operation of the CNB Tri-Fuel boiler shall not exceed the limits specified below:

PM	2	lbs/hr	10	tons/year
PM-10	2	lbs/hr	10	tons/year
Sulfur Dioxide	56	lbs/hr	135	tons/year
Volatile Organic Compounds	2.51	lbs/hr	11	tons/year

(9 VAC 5-80-110 and Condition 16 of 07/23/2007 NSR Permit)

5. Visible emissions from the CNB Tri-Fuel boiler shall not exceed 20 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A), except during one six-minute period in any one hour in which visible emissions shall not exceed thirty (30) percent opacity.
(9 VAC 5-50-80, 9 VAC 5-80-110 and Condition 22 of 07/23/2007 NSR Permit)

B. Monitoring and Recordkeeping

1. Visible Emissions: The CNB Tri-Fuel boiler shall be observed visually at least once each calendar week in which the emissions unit operates. The visual observations shall be conducted using 40 CFR 60 Appendix A Method 22 techniques (condensed water vapor/steam is not a visible emission) for at least a brief time to only identify the presence of visible emissions. Each emissions unit in the Method 22 technique observation having visible emissions shall be evaluated by conducting a 40 CFR 60 Appendix A Method 9 visible emissions evaluation (VEE) for at least six (6) minutes, unless corrective action is taken that achieves no visible emissions. 40 CFR 60 Appendix A Method 9 requires the observer to have a Method 9 certification that is current at the time of the VEE. If any of

these six (6) minute VEE averages exceed the unit's opacity limitation, a VEE shall be conducted on these emissions for at least 3 six-minute periods (at least 18 minutes). All visible emission observations, VEE results, and corrective actions taken shall be recorded. (9 VAC 5-80-110E)

2. Multicyclone: An annual internal inspection shall be conducted on the multicyclone by the permittee to insure structural integrity.
(9 VAC 5-80-110)

3. Operation and Maintenance Procedures - The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to the CNB Tri-Fuel boiler and related air pollution control equipment which affect such emissions:

   a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance for the boiler and multicyclone.

   b. Develop an inspection schedule, monthly at a minimum, to insure operational integrity of the boiler and multicyclone, and maintain records of inspection results.

   c. Have available written operating procedures for the boilers and multicyclones. These procedures shall be based on the manufacturer's recommendations, at a minimum, if such recommendations exist.

   d. Train operators in the proper operation of the boiler and multicyclone and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

   Records of maintenance, inspections and training shall be maintained on site for a period of five (5) years and shall be made available to DEQ personnel upon request.
   (9 VAC 5-80-110, 9 VAC 5-80-110 F & K, 9 VAC 5-50-20 E and Condition 33 of 07/23/2007 NSR Permit)

4. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Air Compliance Manager, West Central Regional Office. These records shall include, but are not limited to:

   a. Coal shipments purchased, indicating sulfur content per shipment.

   b. Annual amount of wood and coal burned calculated monthly as the sum of each consecutive 12-month period.

   c. Records of Maintenance, Inspections and Visible Emission Observations/ Evaluations.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
(9 VAC 5-50-50, 9 VAC 5-80-110 and Condition 26.j & k of 07/23/2007 NSR Permit)

C. Testing

The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
(9 VAC 5-50-30, 9 VAC 5-80-110 and Condition 25 of 07/23/2007 NSR Permit)

D. Reporting

See XI.C. D. E. and F. for Facility-wide reporting requirements.
(9 VAC 5-50-50 and 9 VAC 5-80-110)

IV. DVP Wood Preservation Requirements – Emission Unit #2

A. Limitations

1. The annual usage of solvent-based wood preservative in the Dual Vacuum/Pressure (DVP) wood preservative system shall not exceed 141,396 gallons, calculated monthly as the sum of each consecutive 12 month period.
(9 VAC 5-80-110 and Condition 10 of 07/23/2007 NSR Permit)

2. Emissions from the operation of the Dual Vacuum/Pressure (DVP) wood preservative system shall not exceed the limits specified below:

Volatile Organic Compounds (Stack)	2.7	lbs/hr	3.6	tons/year
Volatile Organic Compounds (Storage/Drying)	2.6	tons/month	30.7	tons/year

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition number IV.A.1.
(9 VAC 5-80-110 and Condition 18 of 07/23/2007 NSR Permit)

B. Monitoring and Recordkeeping

1. Operation and Maintenance Procedures - The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to the DVP wood preservation process equipment which affect such emissions:

   a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance for the DVP wood preservation process equipment.

b. Develop an inspection schedule, monthly at a minimum, to insure operational integrity of the DVP wood preservation process equipment, and maintain records of inspection results.

c. Have available written operating procedures for the DVP wood preservation process equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum, if such recommendations exist.

d. Train operators in the proper operation of the DVP wood preservation process equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance, inspections and training shall be maintained on site for a period of five (5) years and shall be made available to DEQ personnel upon request.
(9 VAC 5-80-110, 9 VAC 5-80-110 F & K, 9 VAC 5-50-20 E and Condition 33 of 07/23/2007 NSR Permit)

2. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Air Compliance Manager, West Central Regional Office. These records shall include, but are not limited to:

   a. Monthly and annual usage of solvent-based wood preservative (in gallons) in the Dual Vacuum/Pressure (DVP) process. Annual usage shall be calculated monthly as the sum of each consecutive 12-month period.

   b. Monthly and annual VOC emissions in tons from the solvent-based wood preservative Dual Vacuum/Pressure process. Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.

   c. Material Safety Data Sheets (MSDS) or Certified Product Data Sheets (CPDS) for the preservatives, paints and sealers used at the facility. VOC content for the material shall be determined using EPA test methods.

   These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
   (9 VAC 5-50-50, 9 VAC 5-80-110 and Condition 26.a, b & l of 07/23/2007 NSR Permit)

C. Testing

The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
(9 VAC 5-50-30, 9 VAC 5-80-110 and Condition 25 of 07/23/2007 NSR Permit)

D. Reporting

See XI.C. D. E. and F. for Facility-wide reporting requirements.
(9 VAC 5-50-50 and 9 VAC 5-80-110)

V. Water Based Wood Preservation Requirements – Emission Unit #3

A. Limitations

1. The dip tanks for the water-based wood preservative dip system shall be covered when that department is not in operation to minimize VOC emissions.
(9 VAC 5-80-110, 9 VAC 5-50-260 and Condition 3 of 07/23/2007 NSR Permit)

2. The annual usage of water-based wood preservative after reduction with water shall not exceed 100,000 gallons, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 11 of 07/23/2007 NSR Permit)

3. Emissions from the operation of the water-based wood preservative dip systems shall not exceed the limits specified below:

Volatile Organic Compounds	9.3	lbs/hr	40.9	tons/year

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition number V.A.2.
(9 VAC 5-80-110 and Condition 19 of 07/23/2007 NSR Permit)

B. Monitoring and Recordkeeping

1. Operation and Maintenance Procedures - The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to the water-based wood preservation process equipment which affect such emissions:

   a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance for the water-based wood preservation process equipment.

   b. Develop an inspection schedule, monthly at a minimum, to insure operational integrity of the water-based wood preservation process equipment, and maintain records of inspection results.

   c. Have available written operating procedures for the water-based wood preservation process equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum, if such recommendations exist.

   d. Train operators in the proper operation of the water-based wood preservation process equipment and familiarize the operators with the written operating procedures. The

permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance, inspections and training shall be maintained on site for a period of five (5) years and shall be made available to DEQ personnel upon request.
(9 VAC 5-80-110, 9 VAC 5-80-110 F & K, 9 VAC 5-50-20 E and Condition 33 of 07/23/2007 NSR Permit)

2. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Air Compliance Manager, West Central Regional Office. These records shall include, but are not limited to:

   a. Monthly and annual water-based wood preservative unreduced and reduced usage in gallons. Annual usage shall be calculated monthly as the sum of each consecutive 12-month period.

   b. Monthly and annual VOC emissions in tons from the water-based wood preservative dipping process. Annual usage shall be calculated monthly as the sum of each consecutive 12-month period.

   c. Material Safety Data Sheets (MSDS) or Certified Product Data Sheets (CPDS) for the preservatives, paints and sealers used at the facility. VOC content for the material shall be determined using EPA test methods.

   These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
   (9 VAC 5-50-50, 9 VAC 5-80-110 and Condition 26.c, d & l of 07/23/2007 NSR Permit)

C. Testing

The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
(9 VAC 5-50-30, 9 VAC 5-80-110 and Condition 25 of 07/23/2007 NSR Permit)

D. Reporting

See XI.C. D. E. and F. for Facility-wide reporting requirements.
(9 VAC 5-50-50 and 9 VAC 5-80-110)

VI. Wood Parts Priming Requirements – Emission Unit #4

A. Limitations

1. The annual throughput of VOC in the water-based frame primer shall not exceed 23.7 tons, calculated monthly as the sum of each consecutive 12-month period. (**See §VI. Endnote**)
   (9 VAC 5-80-110 and Condition 12 of 07/23/2007 NSR Permit)

2. The annual throughput of VOC in the water-based enamel on the water-based frame primer system shall not exceed 4.2 tons, calculated monthly as the sum of each consecutive 12-month period. (**See §VI. Endnote**)
(9 VAC 5-80-110 and Condition 13 of 07/23/2007 NSR Permit)

3. Emissions from the operation of the water-based frame priming system shall not exceed the limits specified below:

Volatile Organic Compounds	27.8	lbs/hr	23.7	tons/year

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition number VI.A.1.
(9 VAC 5-80-110 and Condition 20 of 07/23/2007 NSR Permit)

4. Emissions from the operation of the water-based frame priming system while applying enamel shall not exceed the limits specified below:

Volatile Organic Compounds	6.3	lbs/hr	4.2	tons/year

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition number VI.A.2.
(9 VAC 5-80-110 and Condition 21 of 07/23/2007 NSR Permit)

B. Monitoring and Recordkeeping

1. Operation and Maintenance Procedures - The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to the wood parts priming operation equipment which affect such emissions:

   a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance for the wood parts priming operation equipment.

   b. Develop an inspection schedule, monthly at a minimum, to insure operational integrity of the wood parts priming operation equipment, and maintain records of inspection results.

   c. Have available written operating procedures for the wood parts priming operation equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum, if such recommendations exist.

   d. Train operators in the proper operation of the wood parts priming operation equipment and familiarize the operators with the written operating procedures. The permittee shall

maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance, inspections and training shall be maintained on site for a period of five (5) years and shall be made available to DEQ personnel upon request.
(9 VAC 5-80-110, 9 VAC 5-80-110 F & K, 9 VAC 5-50-20 E and Condition 33 of 07/23/2007 NSR Permit)

2. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Air Compliance Manager, West Central Regional Office. These records shall include, but are not limited to:

   a. Monthly and annual VOC throughput in tons from water-based frame primer usage. Annual throughput shall be calculated monthly as the sum of each consecutive 12-month period. (**See §VI. Endnote**)

   b. Monthly and annual VOC emissions in tons from the water-based frame priming system. Annual usage shall be calculated monthly as the sum of each consecutive 12-month period.

   c. Monthly and annual VOC throughput in tons from water-based enamel usage. Annual throughput shall be calculated monthly as the sum of each consecutive 12-month period. (**See §VI. Endnote**)

   d. Monthly and annual VOC emissions in tons from the water-based frame priming system while applying enamel. Annual usage shall be calculated monthly as the sum of each consecutive 12-month period.

   e. Material Safety Data Sheets (MSDS) or Certified Product Data Sheets (CPDS) for the preservatives, paints and sealers used at the facility. VOC content for the material shall be determined using EPA test methods.

   These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
   (9 VAC 5-50-50, 9 VAC 5-80-110 and Condition 26.e, f, g, h & l of 07/23/2007 NSR Permit)

C. Testing

The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
(9 VAC 5-50-30, 9 VAC 5-80-110 and Condition 25 of 07/23/2007 NSR Permit)

D. Reporting

See XI.C. D. E. and F. for Facility-wide reporting requirements.
(9 VAC 5-50-50 and 9 VAC 5-80-110)

§ VI. Endnote - In the event that a water-based frame primer or enamel MSDS or CPDS lists "emitted VOC", that number will be used to determine the VOC throughput of that particular product

VII. Wood Milling/Machining Requirements – Emission Unit #5

A. Limitations

1. Particulate emissions from the wood dust handling systems shall be controlled by baghouses. The baghouses shall be provided with adequate access for inspection. Each baghouse shall be equipped with a device to continuously measure the differential pressure drop through the baghouse. The devices shall be installed in accessible locations and shall be maintained by the permittee such that they are in proper working order at all times. (9 VAC 5-80-110, 9 VAC 5-50-260 and Condition 6 of 07/23/2007 NSR Permit)

2. All subsequent transfer of the collected material from the baghouses shall be controlled by a baghouse or a completely enclosed transfer system. (9 VAC 5-80-110, 9 VAC 5-50-260 and Condition 7 of 07/23/2007 NSR Permit)

3. The annual throughput of cut stock lumber shall not exceed 20.0 X 10^6 board feet, calculated monthly as the sum of each consecutive 12 month period. (9 VAC 5-80-110 and Condition 9 of 07/23/2007 NSR Permit)

4. Visible emissions from the baghouses shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A), except during one six-minute period in any one hour in which visible emissions shall not exceed thirty (30) percent opacity. This condition applies at all times except during startup, shutdown and malfunction. (9 VAC 5-50-80, 9 VAC 5-80-110 and Condition 23 of 07/23/2007 NSR Permit)

5. Emissions from the operation of the wood working equipment/wood dust handling system exhaust stack shall not exceed the limits specified below:

PM	0.01	gr/dscf	2	lbs/hr	10	tons/year
PM-10	0.01	gr/dscf	2	lbs/hr	10	tons/year

(9 VAC 5-80-110, 9 VAC 5-50-260 and Condition 17 of 07/23/2007 NSR Permit)

B. Monitoring and Recordkeeping

1. Visible Emissions: The baghouse exhausts shall be observed visually at least once each calendar week in which the emission units operate. The visual observations shall be conducted using 40 CFR 60 Appendix A Method 22 techniques (condensed water vapor/steam is not a visible emission) for at least a brief time to only identify the presence of visible emissions. Each emissions unit in the Method 22 technique observation having visible emissions shall be evaluated by conducting a 40 CFR 60 Appendix A Method 9 visible emissions evaluation (VEE) for at least six (6) minutes, unless corrective action is taken that achieves no visible emissions. 40 CFR 60 Appendix A Method 9 requires the

observer to have a Method 9 certification that is current at the time of the VEE. If any of these six (6) minute VEE averages exceed the unit's opacity limitation, a VEE shall be conducted on these emissions for at least 3 six minute periods (at least 18 minutes). All visible emission observations, VEE results, and corrective actions taken shall be recorded. (9 VAC 5-80-110E)

2. Operation and Maintenance Procedures - The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to the woodworking equipment and related air pollution control equipment which affect such emissions:

   a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance for the baghouses and enclosed transfer system.

   b. Develop an inspection schedule, monthly at a minimum, to insure operational integrity of the baghouses and enclosed transfer system, and maintain records of inspection results.

   c. Have available written operating procedures for the baghouses and enclosed transfer system. These procedures shall be based on the manufacturer's recommendations, at a minimum, if such recommendations exist.

   d. Train operators in the proper operation of the baghouses and enclosed transfer system and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

   Records of maintenance, inspections and training shall be maintained on site for a period of five (5) years and shall be made available to DEQ personnel upon request.
   (9 VAC 5-80-110, 9 VAC 5-80-110 F & K, 9 VAC 5-50-20 E and Condition 33 of 07/23/2007 NSR Permit)

3. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Air Compliance Manager, West Central Regional Office. These records shall include, but are not limited to:

   a. Monthly and annual throughput of cut stock lumber in board feet. Annual throughput shall be calculated monthly as the sum of each consecutive 12-month period.

   b. Records of Maintenance, Inspections and Visible Emission Observations/ Evaluations.

   These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
   (9 VAC 5-50-50, 9 VAC 5-80-110 and Condition 26.i of 07/23/2007 NSR Permit)

4. The permittee shall comply with the Compliance Assurance Monitoring (CAM) Plan as detailed in Appendix A of this permit.
(9 VAC 5-80-110)

C. Testing

The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
(9 VAC 5-50-30, 9 VAC 5-80-110 and Condition 25 of 07/23/2007 NSR Permit)

D. Reporting

See XI.C. D. E. and F. for Facility-wide reporting requirements.
(9 VAC 5-50-50 and 9 VAC 5-80-110)

VIII. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutants Emitted	Rated Capacity
IEM-1	Diesel tank	9 VAC 5-80-720 B	VOC	12,000 gals.
IEM-2	LP gas tanks (2)	9 VAC 5-80-720 B	VOC	1,000 gals. each
IEM-3	Diesel tank	9 VAC 5-80-720 B	VOC	275 gals.
IEM-4	Glass cutting operation	9 VAC 5-80-720 B	VOC	Cutting lubricant fluid is used in very small amounts
IEM-5	Glass sealing operation	9 VAC 5-80-720 B	VOC	2-part epoxy sealant; very low VOC content
IEM-6	Seal patching	9 VAC 5-80-720 B	VOC	Hot melt adhesive (essentially zero VOCs)
IEM-7	Inkjet coding of spacer frames	9 VAC 5-80-720 B	VOC	Quantities of ink used are very small
IEM-8	Grille assembly	9 VAC 5-80-720 B	VOC	Very small quantities of VOCs are used
IEM-9	Grinding room cleaning vat (parts cleaner)	9 VAC 5-80-720 B	VOC	Quantities of VOCs used are very small
IEM-10	Grinding room saw blade sharpening lubricant	9 VAC 5-80-720 B	VOC	Quantities of VOCs used are very small
IEM-11	Octagon window assembly	9 VAC 5-80-720 B	VOC	Very small amounts of VOCs are used
IEM-12	Insulated glass maintenance shop parts cleaning sinks (2)	9 VAC 5-80-720 B	VOC	Safety-Kleen sink

Emission Unit No.	Emission Unit Description	Citation	Pollutants Emitted	Rated Capacity
IEM-13	Back-bedding compounds used throughout window assembly area	9 VAC 5-80-720 B	VOC	Very low VOC content
IEM-14	Casement assembly vinyl adhesive	9 VAC 5-80-720 B	VOC	Very low VOC content
IEM-15	Twin seal vinyl adhesive	9 VAC 5-80-720 B	VOC	Very low VOC content
IEM-16	Wood double hung; vinyl double hung sealant	9 VAC 5-80-720 B	VOC	Very low VOC content
IEM-17	V-wood backbedding (glass/vinyl)	9 VAC 5-80-720 B	VOC	Very low VOC content
IEM-18	Vinyl clad double hung adhesive cleaner	9 VAC 5-80-720 B	VOC	Very low VOC content
IEM-19	Twin seal vinyl	9 VAC 5-80-720 B	VOC	Very low VOC content
IEM-20	Vinyl clad double hung adhesive	9 VAC 5-80-720 B	VOC	Very low VOC content
IEM-21	Simulated Divided Light Solvent	9 VAC 5-80-720 B	VOC	Very low VOC content
IEM-22	Product development and testing lab	9 VAC 5-80-720 A	VOCs, others	NA
IEM-23	Drying ovens for spray priming operations	9 VAC 5-80-720 C	fuel burning emissions	<10 MMBtu/hr each; natural gas
IEM-24	Used Oil burner/Space Heater	9 VAC 5-80-720 C	fuel burning emissions	0.35 MMBtu

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

IX. Compliance Plan

Not Applicable

X. Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
No inapplicable requirements have been identified		

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.
(9 VAC 5-80-140)

XI. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9 VAC 5-80-110 N)

B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the effective date of this permit renewal. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.

2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.

3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.

4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.

5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

C. Recordkeeping and Reporting

1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

   a. The date, place as defined in the permit, and time of sampling or measurements.

   b. The date(s) analyses were performed.

   c. The company or entity that performed the analyses.

   d. The analytical techniques or methods used.

   e. The results of such analyses.

   f. The operating conditions existing at the time of sampling or measurement.

   (9 VAC 5-80-110 F)

2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
   (9 VAC 5-80-110 F)

3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **September 1** and **March 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

   a. The time period included in the report. The time periods to be addressed are **January 1 to June 30** and **July 1 to December 31**.

   b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:

      (1) Exceedance of emission limitations or operational restrictions;

      (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or

compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,

(3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

d. The report shall be sent to the following address:

Air Compliance Manager, VA DEQ
3019 Peters Creek Road
Roanoke, VA 24019

(9 VAC 5-80-110 F)

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and to DEQ no later than **March 1** each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

1. The time period included in the certification. The time period to be addressed is **January 1 to December 31**.

2. The identification of each term or condition of the permit that is the basis of the certification.

3. The compliance status.

4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.

5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.

6. Such other facts as the permit may require to determine the compliance status of the source.

7. This annual compliance certification shall be sent to the following addresses:

Air Compliance Manager, VA DEQ
3019 Peters Creek Road
Roanoke, VA 24019

and

U. S. Environmental Protection Agency, Region III
Clean Air Act Title V Compliance Certification (3AP00)
1650 Arch Street
Philadelphia, PA 19103-2029

(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

The permittee shall notify the Air Compliance Manager, West Central Regional Office, within four (4) daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition XI.C.3 of this permit.
(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Air Compliance Manager, West Central Regional Office, by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Air Compliance Manager, West Central Regional Office.
(9 VAC 5-20-180 C)

G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9 VAC 5-80-110 G.1)

H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.
(9 VAC 5-80-110 G.2)

I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
(9 VAC 5-80-110 G.3)

J. Permit Modification

A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1605, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.
(9 VAC 5-80-190 and 9 VAC 5-80-260)

K. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege.
(9 VAC 5-80-110 G.5)

L. Duty to Submit Information

1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.
(9 VAC 5-80-110 G.6)

2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.
(9 VAC 5-80-110 K.1)

M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by **April 15** of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.
(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;

2. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;

3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;

4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,

5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-50-90)

O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
(9 VAC 5-50-20 E)

P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.
(9 VAC 5-80-110 J)

Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.

2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.

3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.

4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

R. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

S. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.
(9 VAC 5-80-150 E)

T. Transfer of Permits

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.
(9 VAC 5-80-160)

2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

U. Malfunction as an Affirmative Defense

1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.

2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:

    a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.

    b. The permitted facility was at the time being properly operated.

    c. During the period of the malfunction, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in the permit.

    d. The permittee notified the board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirement of 9 VAC 5-80-110 F.2.b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirements under 9 VAC 5-20-180 C.

3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.

4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

(9 VAC 5-80-250)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe, any permit for any of the grounds for revocation or termination or for any other violations of these regulations.
(9 VAC 5-80-190 C and 9 VAC 5-80-260)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(40 CFR Part 82, Subparts A-F)

Y. Asbestos Requirements

The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).
(9 VAC 5-60-70 and 9 VAC 5-80-110 A.1)

Z. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.
(40 CFR Part 68)

AA. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
(9 VAC 5-80-110 I)

BB. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.

2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.

3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)

XII. State-Only Enforceable Requirements

The following terms and conditions are not required under the federal Clean Air Act or under any of its applicable federal requirements, and are not subject to the requirements of 9 VAC 5-80-290 concerning review of proposed permits by EPA and draft permits by affected states.

1. **Emission Limits (Emission Unit #4) -** Emissions from the operation of the water-based frame priming system shall not exceed the limits specified below:

2-butoxyethanol	7.9	lbs/hr	17.0	tons/year

Failure to comply with this condition may result in the exceedance of the significant ambient air concentration of 2-butoxyethanol and could result in enforcement action.
(9 VAC 5-80-110 N2, 9 VAC 5-60-200, 9 VAC 5-60-300, 9 VAC 5-80-300 and Condition 38 of 07/23/2007 NSR Permit)

2. **Recordkeeping -** The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Air Compliance Manager, West Central Regional Office. These records shall include, but are not limited to:

   a. The monthly and annual throughput in gallons of the wood parts primer used in the priming system. Records should be kept of the throughput of primer for each of the six separate priming operations. Annual throughputs shall be calculated monthly as the sum of each consecutive 12-month period.

b. Monthly emission calculations for 2-butoxyethanol from the priming system using calculation methods approved by the West Central Region to verify compliance with the lb/hr and ton/yr emissions limitations in Condition XII.1.

c. Material Safety Data Sheets (MSDS) or other vendor information showing 2-butoxyethanol content for each primer used.

(9 VAC 5-80-110 N2, 9 VAC 5-80-300, 9 VAC 5-50-50 and Condition 39 of 07/23/2007 NSR Permit)

XIII. Appendix A - CAM Plan

2 Fabric Filter Baghouses on Woodworking Operation

Indicator	**Indicator 1**	**Indicator 2**	**Indicator 3**
	Baghouse differential pressure	Visible emissions	Work practice: inspection
Measurement approach	Observe and record the operating differential pressure of each baghouse system, at least once per week.	Visible emissions from each baghouse exhaust will be monitored and recorded at least weekly using EPA Reference Method 22 techniques (40 CFR 60, Appendix A).	Annual ductwork and internal bag filter inspections by a qualified employee to verify structural integrity. Results recorded upon completion of each inspection.
Indicator range **Quality Improvement Plan (QIP) Threshold**	< 2.5 inches of water column (operation outside of this pressure range constitutes an excursion)	Visible emissions not to exceed five percent opacity, except for one six-minute period in any one hour not to exceed thirty percent opacity. At all times except during startup, shutdown and malfunction.	Internal components (including each individual bag) of and all ductwork leading to each baghouse shall be repaired or replaced as needed (failure to perform annual internal inspection or to repair or replace components as needed in a timely manner constitutes an excursion)
	No more than two excursions outside of the indicator range in any semi-annual reporting period.	No more than two excursions outside of the indicator range in any semi-annual reporting period.	N/A
Performance criteria: **Data Representativeness**	The monitoring system for each baghouse consists of a differential pressure gauge that compares the pressures in the inlet and outlet ducts of each baghouse. Accuracy: ± 2% Range: 0-10 (both baghouses)	Observations are being made at the emission point of each baghouse.	Each fabric filter bag, unit housing, associated internal components and all ductwork leading to each baghouse and to the sawdust trailers shall be inspected for signs of wear, leakage, or other deterioration that may affect the efficient operation of the system.
Verification of operational status	N/A	Records that indicate time, facility operational status and results of each observation shall be maintained on site.	Inspection records

Indicator	**Indicator 1**	**Indicator 2**	**Indicator 3**
QA/QC practices and criteria	Validation of pressure gauge conducted annually by comparing gauge reading to calibrated meter or by calibrating using pressure standard or according to manufacturer's instructions.	Qualified personnel to perform observations.	Qualified personnel familiar with the operating principles of fabric filtration shall perform the inspection and maintenance.
Monitoring frequency	Pressure drop shall be measured continuously and observed at least weekly.	Weekly	Annually
Data collection procedures	Pressure drop shall be monitored and displayed continuously. Results of weekly observations shall be recorded in a log.	A log shall be kept showing the time, facility operational status and results of each observation.	A record shall be kept of all inspections, observations, and any maintenance or corrective action taken.
Averaging period	N/A	N/A	N/A